

STEP TWO: IDENTIFY HISTORIC PROPERTIES

A: Identify Historic Properties and Field Survey

The primary method for identifying unknown cultural resources (sites) in a project impact area is a field survey or inventory. This identification effort is predicated on the definition of the undertaking, the APE and initial information collection such as file search results illustrating previous inventory and sites known to occur in the vicinity. Land owners of course should be consulted and may provide additional up front information on cultural resources in the area.

Timing of Survey

Agencies should have their projects reviewed, and any new inventory completed for review by the SHPO, as early in the planning process as possible. Should their project potentially affect important cultural resources, the early identification of that possible impact may allow agencies to exercise options which may not be available after the project has proceeded so far as to make plan modifications unlikely.

Although the SHPO will make every reasonable effort to carry out its review responsibilities in a timely manner, various portions of the cultural resource evaluation procedure require time. This can be frustrating to agencies and their applicants if, for example, they are anxious to let bids or get construction underway. This frustration can almost always be avoided **by early consultation with the SHPO by the agency** - regardless of whether an agency, applicant or consultant initiates the consultation.

Qualifications of Survey Personnel

In the absence of other agreement, all cultural resources surveys must be carried out under the professional direction of a Principal Investigator. Generally speaking, the Principal Investigator must have an advanced college degree in archaeology, architectural history, historical architecture or history, as appropriate to the particular requirements of the survey, as well as meet other academic and experience requirements for the discipline found in *Archaeology and Historic Preservation; Secretary of Interior's Standards and Guidelines, Federal Register 1983, Vol. 48, No. 190, pages 44738-44739*. Principal Investigators may document that they have met the above requirements in a vita on file with the SHPO. The Montana State Historic Preservation Office however does not have the authority or responsibility to certify professional consultants. Field inventory personnel must be under the direct filed supervision of a professional meeting the Secretary's Standards for this requirement to be met.



In addition, that person should have documented experience identifying and recording northern plains site types. Failure to follow this prescription risks reports being returned and recommendations questioned and other delays. If an agency has para professional training programs they should be vetted in formal agreement with SHPO to avoid misunderstandings. Tribal representatives who do not meet the Secretary Standards for history or archaeology may be still be qualified by THPOs or elders for properties of interest to tribes (religious and cultural significance) and be accepted by SHPO reviewers.

SHPO will furnish, upon request, a list of known cultural resource survey contractors, but this listing is not a guarantee that these contractors meet professional standards or conduct quality work. Individuals or organizations are placed on this list at their own request. This list is a service but is not an endorsement or recommendation. The Principal Investigator should sign each report, attesting to its completeness, accuracy, professional adequacy of content, and the competence of the survey personnel to identify and/or evaluate cultural resources. In any case the agency is responsible for seeing that the Secretary's Standards and SHPO consultation guidance is followed.

Survey Coverage

National Register Bulletin 24:2 (Guidelines for Local Surveys: A Basis for Preservation Planning) defines an inventory as a compilation of Historic Properties; here, we follow common usage in the state and refer to survey or inventory reports as compilations including all cultural resources in an APE. An intensive survey seeks to identify all cultural resources in the APE. The NPS has classified those resources into five categories of cultural resources - buildings, sites, structures, objects and districts. Somewhat different efforts are required to identify, record and document different resources. The National Register Bulletin series (see Appendix 11) provides comprehensive guidance and should be consulted regularly.

Transects for an intensive field survey should in general be no more than 30m apart and should (in absence of other reasoned considerations) cover the entire APE. The report must indicate actual methods used. It must also explain methodology, for example: why or why not an archaeologist did or did not conduct subsurface testing; what archival or legal documents were accessed, why any areas (indicated on a 7.5' map) were not inventoried at the maximum 30 m transect interval standard (e.g. slopes greater than 30% grade, plow zone over upland glacial till, or area was historically built of fill). Surface visibility conditions (e.g. "percentage" of surface visibility) must be described in detail throughout the survey area and conditions such as poor visibility or dense artifact/features may call for narrower transect intervals. Reports not containing this information will cause delays in review. Photos of the ground surface, exposures and vegetation must be included in the report.

The intensive survey should result in a detailed report on each historic building, structure, district, object or archaeological or Traditional Cultural site in the APE and the efforts made to identify each. The survey report basic requirement is a firm and clear basis for reporting agency findings to SHPO. SHPO will review methods and recommendations of reports to state and federal standards upon request by an agency. The following are landforms particularly warranting survey coverage:

rolling finger ridges, promontories, stream benches, fluvial-glacial terraces, plateau margins, ridge crests, saddles and approaches, confluences of streams (current and past), stream crossings and approaches, resource procurement features such as lithic sources/outcrops, ethnobotanical plant communities, mineral and paint out outcrops, talus slopes and rimrocks (burials, rock art), and locations of reported or known sites. Areas not inspected should be explained.

It is important to remember that a Right of Way does not always equate with a level of disturbance eliminating the need for inventory. If prior disturbance is suspected consultation with SHPO about the need for inventory is warranted. Similarly, if a cable is to be placed in an effort to eliminate the need for full inventory a field check of previous disturbance areas along a staked project line and a site records check to verify such conditions will likely be called for. Cable placed in a constructed drainage or borrow ditch parallel to a maintained road or within the existing prism of a constructed surface (top of cut to toe of fill), once those conditions are verified, will not warrant an intensive inventory.